

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: 02/24/2010

Name of company covered by this certification: Pennydial, Inc.

Form 499 Filer ID: 827811

Name of signatory: Benjamin Sanchez Murillo

Title of signatory: President

I, Benjamin Sanchez Murillo, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

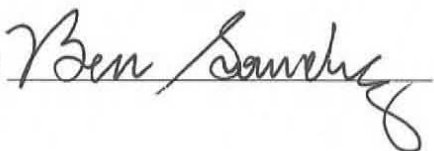
The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

If affirmative: N/A

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

If affirmative: N/A

Signed

A handwritten signature in black ink, appearing to read "Ben Sanchez", written over a horizontal line.



Penny Dial
Telecommunications

Wednesday, February 24, 2010

Commission's Secretary,
Marlene H. Dortch,
Office of the Secretary,
Federal Communications Commission,
445 12th Street, SW, Suite TW-A325, Washington, DC 20554

To Whom It May Concern:

Pennydial, Inc. assures that we are in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules by the following:

- Pennydial does not sell directly to end users. We sell to distributors that sell to stores and those stores sell to the consumer. We have no access to any customer's personal information other than the number that they are calling from and the number they are calling to.
- Pennydial's platforms and internal systems are password protected and sufficiently secured.
- All Pennydial employees have been made aware of the importance of privacy and the consequences of not adhering to the privacy policy that Pennydial has put in place.
- Pennydial company policy is to never sell, or give out any phone numbers or personal information to third parties.

Please kindly contact me for any questions or concerns.

Yours Truly,

Benjamin Sanchez Murillo
President
Pennydial, Inc.

DJ/BS/mpc.

Cc: Company File